

EXHIBIT 3

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

ALEXANDRIA DIVISION

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ROSY GIRON DE REYES;
JOSE DAGOBERTO REYES;
FELIX ALEXIS BOLANOS;
RUTH RIVAS; YOVANA JALDIN SOLIS;
ESTABAN RUBIN MOYA YRAPURA;
ROSE ELENA AMAYA, and
HERBERT SARAVIA CRUZ,

Plaintiffs,

CASE NO:
1:16ev00563-TCB

Vs.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP; WAPLES PROJECT
LIMITED PARTNERSHIP; and
A.J. DWOSKIN & ASSOCIATES, INC.,

Defendants,

DEPOSITION OF MARK ANDREW JONES

Falls Church, Virginia

November 22, 2016

9:30 a.m.

Reported By:
Chris Fox
Job No: 47656

	26		28
1	that they are distinct entities, so you have to be	1	A. No.
2	careful in asking questions because most of the	2	Q. What document would I look to figure that
3	folks are not employees of any entity other than	3	out?
4	the A.J. Dwoskin entity.	4	A. The financial statement.
5	(Deposition Exhibit 4,	5	Q. Is that publicly available?
6	Organization chart	6	A. No.
7	Marked for Identification)	7	Q. Do you know whether it's been produced in
8	BY MS. ODOM:	8	this case?
9	Q. Mr. Jones, I want you to take a look at this.	9	A. No, it has not.
10	Have you ever seen this document before?	10	Q. Do either Waples Mobile Home Park Limited
11	A. Yes, I have.	11	Partnership or Waples Project Limited Partnership
12	Q. Can you tell me what it is?	12	receive any federal funding or federal financial
13	A. It is an organization chart of the entities.	13	assistance?
14	Q. And those entities include Waples Mobile Home	14	MR. DINGMAN: I'm going to object to the
15	Park Limited Partnership?	15	question, because the financial status or
16	A. Correct. Waples Project Limited Partnership.	16	background of these entities is not a topic in the
17	Q. Um-hmm.	17	Notice of Deposition; nonetheless, to the extent
18	A. And Waples AJD Corp.	18	that Mr. Jones can answer the question, I'll allow
19	Q. What's the relationship between these	19	him to answer based on his personal knowledge, but
20	entities?	20	this was not a topic in the corporate deposition.
21	A. The Waples Project Limited Partnership owns	21	BY MS. ODOM:
	27		29
1	interest in Waples Mobile Home Park LP. So let me	1	Q. You can go ahead and answer, Mr. Jones.
2	go -- it's the opposite actually. The Waples Mobile	2	A. No, we have no agreements with federal
3	Home Park LP owns the Project Limited Partnership,	3	funding.
4	Waples Project Limited Partnership which owns the	4	Q. Okay. If you look on Exhibit 4 on the
5	asset.	5	left-hand side, there's Waples/AJD Corp. I'm sorry,
6	Q. Okay. And how do those two entities relate	6	it's a little bit hard to read. It looks like it's
7	to A.J. Dwoskin & Associates, Inc.?	7	General Partner Interest. How does that fit in with
8	A. We manage the property or the asset.	8	the other entities?
9	Q. Does A.J. Dwoskin & Associates own an	9	A. It is an S Corporation that houses the one
10	interest in Waples Mobile Home Park Limited	10	percent GP interest in the Waples Project Limited
11	Partnership?	11	Partnership.
12	A. No.	12	MS. ODOM: Can you hand me 65, please.
13	Q. Does A.J. Dwoskin & Associates, Inc. take a	13	(Deposition Exhibit 5,
14	fee for the management of the assets?	14	Notice of Deposition
15	A. Yes.	15	Marked for Identification)
16	Q. How much is that fee on an annual basis?	16	BY MS. ODOM:
17	A. It's -- it is 5 percent of gross revenue.	17	Q. Mr. Jones, if you'll take a look at this and
18	Q. Of A.J. Dwoskin's gross revenue?	18	let me know if you recognize this document?
19	A. Of Waples' Project.	19	A. Yeah, I do recognize this document.
20	Q. Okay. Are you able to estimate that in	20	Q. Was this one of the documents you reviewed in
21	dollars?	21	preparing for your deposition today?